



Region 2 Enforcement & Compliance Assurance Division
Air Compliance Branch
CAA Inspection Report

Inspection Date: 12/14/2022

Facility Name: Cascades Tissue

Facility Address: 510 S Main Street, Mechanicville, NY 12118

ICIS-Air ID #: NY0000005413800017

Facility Contact: Kamal Hussain, Process Technician, kamal_hussain@cascades.com

EPA Lead Inspector: Richard Kan

EPA Asst. Inspector: Katherine Marmanides

State Inspector(s): Yasmini Patel, Inspector, yasmini.patel@dec.ny.gov

Other Inspector(s): Other inspector name, title, phone number.

Pertinent Regulatory Requirements

40 C.F.R. Part 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

Summary of Observations

We arrived at Cascades Tissue around 9:10 a.m. along with NYSDEC Inspector Patel. We were greeted by Mr. Kamal Hussain, Process Technician for Cascades Tissue, and proceeded to conduct an opening conference in a meeting area. Mr. Brian Plude, Production Manager, also joined us shortly after. We presented our credentials and explained that the purpose of EPA's visit was to conduct a routine full compliance evaluation of Cascades Tissue with respect to the Clean Air Act. Mr. Hussain provided us with a brief overview of Cascades Tissue's background and facility operations.

We were informed that there are about 45 employees, and the facility operates on a 24 hours a day /7 days a week /365 days a year schedule with two 12-hour shifts. This facility of Cascades Tissue is in the business of manufacturing tissue paper products and took over American Tissue in the 1960s. The main product produced is industrial towel papers manufactured from one paper machine. Raw material such as post-consumer cardboard is pulped, dried, wound into rolls, and shipped to another facility to be further cut and converted. Approximately 160 tons of paper is produced per day.

As part of the sole paper machine, there is a Yankee dryer that operates on steam from the facility's only boiler. The boiler operates on natural gas and has the capability to use diesel fuel as a backup. Cascades Tissue shuts down once a year for about a week to service the boiler and resurface the Yankee dryer machine. The last shutdown occurred in October 2022. There are no plans for expansion or new equipment currently.

At around 10:00 a.m., we proceeded on a facility walkthrough with Mr. Hussain. We met with Phil, one of the maintenance managers, who was able to provide more information about the boiler. We were informed that Clean Harbors was contracted to remove a 60,000 gallon oil tank for #6 fuel oil about 4 years ago. The boiler still retains the capability to burn #2 fuel oil but none is stored on site. If #2 fuel oil is required such as during an emergency, then an outside tanker truck would need to delivery the fuel. This backup fuel would mostly be used to run the boiler to prevent freezing in the facility and not for operating the paper machine. The last time #2 fuel oil was used was when the #6 fuel oil tank was removed.

At the boiler room, we noted that there is one 1978 Babcock & Wilcox Co. boiler with 60,000 lb/hr capacity. O₂ sensor reading on the control panel read 7.73% O₂. Troy Boiler Works Co. has been the contractor that tunes and services the boiler annually. Cascades Tissue maintains the oxygen trim to keep oxygen levels higher (9-10%) than needed for efficient burning. If oxygen levels fall below 2%, the boiler shuts off. In the boiler room area, we reviewed the 'daily blow down log' that is completed by the boiler operator. There are no other daily checks but there are monthly water checks.

After concluding the facility walkthrough, we returned to the meeting area to conduct a closing conference. We requested the latest three years of boiler tune up records to be sent electronically. No areas of concern were observed during the inspection. Although #6 fuel oil is no longer in use as a fuel source for the boiler, Cascades Tissue's NYSDEC permit still identifies it as an existing process. It was suggested that the permit be updated during the next renewal or modification to accurately reflect current fuel use capabilities of the boiler. We concluded the inspection at around 11:00 a.m.

Lead Inspector's Name: Richard Kan

1/19/2023

X Richard Kan

Lead Inspector

Signed by: RICHARD KAN

Assisting Inspector's Name: Katherine Marmanides

1/19/2023

X Katherine G. Marmanides

Assisting Inspector

Signed by: Environmental Protection Agency

Supervisor's Name: Nancy Rutherford

1/23/2023

X Nancy Rutherford

Supervisor

Signed by: Nancy Rutherford